



COALITION ON HUMAN NEEDS

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I submit these comments on behalf of the Coalition on Human Needs. The Coalition on Human Needs (CHN) is an alliance of national organizations working together to promote public policies which address the needs of low income and other vulnerable populations. The Coalition co-leads a national group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products.

Formal Privacy and the ACS

The Coalition thanks the Census Bureau for its decision to delay the implementation of a formally private methodology for protecting privacy in the American Community survey (ACS) because the science does not yet exist to implement such a program.

<https://www.census.gov/newsroom/blogs/random-samplings/2022/12/disclosure-avoidance-protections-ac.html> The Coalition continues to believe that, in order to be able to produce child poverty data and other key measures of child well-being, any methodology for protecting privacy in the ACS must keep the connection between data on children and data on adults in the same household.

Population Estimates

We thank the Census Bureau for allocating additional staffing resources to the Population Estimates program. Because the Population Estimates are used to allocate some federal funding directly, and also shape the American Community Survey which drives many other federal funding streams, improving the accuracy of these estimates is vital. We hope that the increased staffing will permit a year-round research program to further improve the estimates through the blended base, given that right now so much staff time is needed to produce the population estimates. We applaud the improvements to the Population Estimates series that make the count of young children more accurate, but note that the Bureau has not yet been able to assess whether the improvements also improve the count of Black and Hispanic men aged 25-40, who historically have also been badly undercounted. We urge the Bureau to conduct research to assess whether it can improve the total state population counts, which drive a very significant portion of all federal funding to states.

CBAMS

The Coalition also thanks the Bureau for deciding to conduct CBAMS research every two years rather than waiting until 2028. In particular, we thank you for including questions on young children in the planned research for 2023-2024. The Coalition recommends that the Bureau explain how it plans to build on the 2023-4 research in future years and share with the public the 2022 research questions and responses so that census partners can learn from and build upon that work. Will the CBAMS also include focus groups every two years?

The Coalition recommends that as the Bureau develops its questions for the various CBAMS studies, staff review the communications research that the Coalition and other census partners conducted

before the 2020 Census. It particularly recommends the research conducted by NALEO with immigrants, and the Count All Kids research on counting young children.

Research for new OMB Standards on Race and Ethnicity

The Coalition recommends that the Bureau put out a clear, public explanation of how assignments of race are made in the 2020 Census, and that the Bureau further review this process and conduct research on how best to do it in the future, if it continues to be required to assign race where people have not selected a race. In particular, when the Bureau revises this process we recommend that the Bureau stop assigning race on the basis of national origin. Just as the United States is very diverse, so are other countries; national origin is not an appropriate indicator of race. Instead, we suggest that the Bureau research alternative approaches.

The Coalition also recommends further research on the exact language of a combined question for collecting data on race and ethnicity, including testing a question stem that instructs respondents to select all “race **and/or** ethnicities” that apply, and including the use of different examples for what people can write in to provide more detailed responses under the minimum standards. When the Bureau reports on this research, we urge that it include an age analysis.

Ancestry on the ACS

The Coalition recommends that the Bureau delay any decision on removing the Ancestry question from the ACS. While we appreciate the need to reduce respondent burden and keep the ACS short, we also know that this data can be used for civil rights enforcement and is closely related to ethnicity and national origin. It makes no sense to act on this piece separately.

If you have any questions about these comments, please contact me at dweinstein@chn.org

Sincerely,

Deborah Weinstein

Executive Director